

Remarks

Reexamination and reconsideration of the application as amended is respectfully requested.

The present filter and filtration sealing system relies on the provision of a perimeter type flange at the uppermost top edge of the filter frame in a continuous or substantially continuous manner which allows the filter to be retained between the overlying air plenum or diffuser and the suspension elements of a suspension ceiling. The flanges as such do not act as sealing elements as described in the documents cited by the Examiner, between a filter frame and a housing, but rather act as a retaining element. The flange is positioned so as to hold the filter in suspended manner. This retaining function relies on the counterbalancing of forces on the flange namely the downward force of the weight of the air plenum resting flange and the upward force exerted by the suspension ceiling T-rails upon which the flange is resting. The specific flange design creates a convenient system for allowing the retrofitting of air delivery diffusers in conventional T-rail-type suspension ceilings provided with air plenums or diffusers.

The primary reference Wetzel does disclose the provision of a filter media retained in a filter frame located in a suspension ceiling however the method for retaining the filter and filter frame within the suspension ceiling is very complicated and specific and has nothing to do with the provision of a flange at the uppermost edge of the filter frame which allows a filter to be retained by a sandwiching of the flange between an overlying plenum and underlying suspension rails. There is absolutely no teaching in Wetzel of Applicants' claimed filter panel or suspension ceiling filter system.

In one were to modify the Wetzel document using the secondary references Schottmer or Michaelis, again one would not have the present invention. Neither Schottmer nor Michaelis would teach or suggest providing their flanges at the uppermost surface of their filter frames. Further, placing flanges at the uppermost edge of the filter in either Schottmer or Michaelis would clearly be contrary to the teachings in these references. These filters are inserted into frames or housing where the major portion of the filter flange engaging with the frame is either at the bottom or middle portions of the filter. A flange provided at the top end of these filters would not be able to engage with an opposing surface of the filter frames or housings. The housing would not have a surface opposing the flange sufficient to allow the flanges to engage in

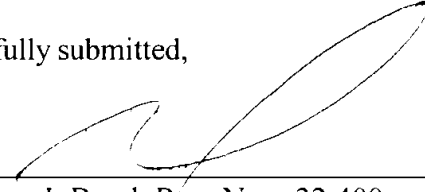
the manner taught in these references. A flange provided at the top edge of the filter frame in these references would stick up over the housing and would tend to pop the filters out of their housings rather than form a seal.

Further, the provision of a flange at the uppermost edge of a filter frame in Wetzel would appear to be contrary to the teachings of Wetzel as well. In Wetzel, the critical sealing occurs by use of the potting compound or gel seal. As such, a sealing type flange as taught in the secondary references would first not be necessary in view of the gel seal and second would likely interfere with the function of the gel seal. In any event, the primary reference Wetzel fails to teach or suggest a ceiling filtration system comprised of suspension rails having essentially horizontal elements with a moveable air delivery plenum or diffuser resting on the suspension rails and sandwiching filter element flanges between the air delivery plenum or diffuser and the suspension rails. This deficiency is not in any way met by the secondary references.

In view of the above, further and favorable action in the form of a Notice of Allowance is believed to be in order and such is respectfully requested.

Respectfully submitted,

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Date

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